

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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Minnesota Chamber of Commerce, *a*  
*Minnesota nonprofit corporation,*

Plaintiff,

vs.

John Choi, in his official capacity as  
County Attorney for Ramsey County,  
Minnesota; George Soule, in his official  
capacity as Chair of the Minnesota  
Campaign Finance and Public Disclosure  
Board; David Asp, in his official capacity  
as Vice Chair of the Minnesota Campaign  
Finance and Public Disclosure Board;  
Carol Flynn, in her official capacity as  
Member of the Minnesota Campaign  
Finance and Public Disclosure Board;  
Margaret Leppik, in her official capacity  
as Member of the Minnesota Campaign  
Finance and Public Disclosure Board;  
Stephen Swanson, in his official capacity  
as Member of the Minnesota Campaign  
Finance and Public Disclosure Board; and  
Faris Rashid, in his official capacity as  
Member of the Minnesota Campaign  
Finance and Public Disclosure Board,

Defendants

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Case No.: 0:23-cv-02015

**DECLARATION OF CIANNA G.  
HALLORAN IN SUPPORT OF  
PLAINTIFF’S MOTION FOR  
ATTORNEY’S FEES AND  
EXPENSES**

I, Cianna G. Halloran, hereby declare:

1. I am an attorney with the law firm of Winthrop & Weinstine, P.A., and I am one of the attorneys of record for Plaintiff Minnesota Chamber of Commerce (“Chamber”) in the above-captioned matter.

2. I have reviewed the time entries identified by State Defendants that purport to relate to the legal services rendered for the Chamber in working with the declarants in these proceedings. Based on that review, I have ascertained that some portions of those entries were not spent on working with the declarants, but instead relate to other work done for the Chamber in this action. I have provided the amount of time from those entries estimated to have been spent working with the declarants developing evidence to respond to Defendants' discovery and support the Chamber's claims in the third column below:

<b>Entry Date</b>	<b>State Defendants' Suggested Reduction Amount</b>	<b>Chamber's Identification of Time Spent on Declarants</b>
9/21/2023	\$1,785.00	\$875.00 (time of 2.5)
9/25/2023	\$735.00	\$175.00 (time of .5)
10/3/2023	\$105.00	\$105.00
10/9/2023	\$2,131.50	\$0.00 <sup>3</sup>
10/10/2023	\$217.50	\$0.00 <sup>1</sup>
10/11/2023	\$280.00	\$35.00 (time of .1)
10/16/2023	\$315.00	\$70.00 (time of .2)
12/7/2023	\$1,015.00	\$105.00 (time of .3)
12/8/2023	\$2,170.00	\$805.00 (time of 2.3)
12/10/2023	\$595.00	\$70.00 (time of .2)
12/11/2023	\$1,917.00	\$284.00 (time of .4)
12/12/2023	\$630.00	\$630.00
12/12/2023	\$2,272.00	\$213.00 (time of .3)
12/19/2023	\$245.00	\$140.00 (time of .4)
12/20/2023	\$609.00	\$304.50 (time of .7)
12/20/2023	\$700.00	\$420.00 (time of 1.2)
12/21/2023	\$1,704.00	\$1065.00 (time of 1.5)
12/21/2023	\$1,225.00	\$770.00 (time of 2.2)
12/22/2023	\$1,633.00	\$1,278 (time of 1.8)
12/22/2023	\$1,120.00	\$560.00 (time of 1.6)
12/26/2023	\$639.00	\$639.00
12/27/2023	\$284.00	\$284.00
12/28/2023	\$175.00	\$70.00 (time of .2)
12/29/2023	\$1,136.00	\$781.00 (time of 1.1)

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<sup>1</sup> These time entries have to do with responding to discovery sought from the Chamber.

12/29/2023	\$652.50	\$87.00 (time of .2)
12/30/2023	\$1,365.00	\$1,155.00 (time of 3.3)
1/1/2024	\$75.00	\$37.50 (time of .1)
1/2/2024	\$423.00	\$329.00 (time of .7)
1/2/2024	\$750.00	\$187.50 (time of .5)
1/3/2024	\$900.00	\$450.00 (time of 1.2)
1/4/2024	\$750.00	\$300.00 (time of .8)
1/5/2024	\$1,050.00	\$187.50 (time of .5)
1/7/2024	\$825.00	\$750.00 (time of 2.0)
1/8/2024	\$750.00	\$675.00 (time of 1.8)
1/11/2024	\$1,875.00	\$187.50 (time of .5)
1/11/2024	\$384.00	\$320.00 (time of 1.0)
1/12/2024	\$862.50	\$675.00 (time of 1.8)
1/12/2024	\$4,779.00	\$3,321.00 (time of 4.1)
1/13/2024	\$37.50	\$37.50
1/14/2024	\$75.00	\$75.00
1/14/2024	\$37.50	\$37.50
1/14/2024	\$486.00	\$486.00
1/16/2024	\$750.00	\$750.00
1/19/2024	\$37.50	\$37.50
2/5/2024	\$37.50	\$0.00 <sup>2</sup>
2/5/2024	\$324.00	\$324.00
2/6/2024	\$825.00	\$150.00 (time of .4)
2/6/2024	\$486.00	\$486.00
2/6/2024	\$188.00	\$188.00
2/12/2024	\$344.00	\$344.00
2/7/2024	\$1,425.00	\$937.50 (time of 2.5)
2/7/2024	\$47.00	\$47.00
2/8/2024	\$37.50	\$0.00 <sup>3</sup>
2/12/2024	\$752.00	\$752.00
2/12/2024	\$637.50	\$525.00 (time of 1.4)
2/12/2024	\$972.00	\$972.00
2/13/2024	\$600.00	\$729.00 (time of .9)
2/13/2024	\$188.00	\$188.00
2/13/2024	\$324.00	\$324.00
2/14/2024	\$423.00	\$329.00 (time of .7)
2/14/2024	\$2,187.00	\$2,187.00

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<sup>2</sup> Sending clients the deposition transcript of a non-party is related to the litigation generally.

<sup>3</sup> This time entry is regarding the Chamber's deposition transcript and confidential designations.

2/14/2024	\$787.50	\$600.00 (time of 1.6)
2/15/2024	\$1,612.50	\$937.50 (time of 2.5)
2/15/2024	\$141.00	\$141.00
2/16/2024	\$160.00	\$160.00
2/16/2024	\$487.50	\$487.50
2/16/2024	\$141.00	\$141.00
2/19/2024	\$1,457.00	\$1,457.00
2/19/2024	\$1,462.50	\$1,050.00 (time of 2.8)
2/19/2024	\$160.00	\$160.00
5/14/2024	\$637.50	\$637.50
6/6/2024	\$192.00	\$192.00
6/25/2024	\$278.00	\$0.00 <sup>4</sup>
8/22/2024	\$430.00	\$430.00
8/22/2024	\$450.00	\$75.00 (time of .2)
8/23/2024	\$37.50	\$37.50
8/28/2024	\$258.00	\$258.00
<b>Total</b>	<b>\$58,992.00</b>	<b>\$35,010.50</b>

3. I have reviewed the time entries identified by State Defendants that include redactions of any amount. Based on that review, I have provided the amount of time attributable to the redacted part of the time entry in the third column below:

<b>Entry Date</b>	<b>State Defendant's Suggested Reduction of Redacted Entries</b>	<b>The Chamber's Identification of Entries Redacted</b>
5/1/2023	\$852.00	\$426.00 (time of .6)
6/1/2023	\$1,000.50	\$348.00 (time of .8)
6/3/2023	\$1,278.00	\$284.00 (time of .4)
6/6/2023	\$105.00	\$35.00 (time of .1)
6/19/2023	\$304.50	\$87.00 (time of .2)
6/28/2023	\$2,001.00	\$416.87 (time of 1.0)
6/28/2023	\$1,575.00	\$130.50 (time of .3)
7/3/2023	\$1,207.00	\$284.00 (time of .4)
7/5/2023	\$455.00	\$175.00 (time of .5)
7/5/2023	\$426.00	\$142.00 (time of .2)
7/6/2023	\$348.00	\$261.00 (time of .6)
7/6/2023	\$1,704.00	\$142.00 (time of .2)
7/9/2023	\$175.00	\$175.00

<sup>4</sup> There is no time entry on this date for this amount.

7/14/2023	\$2,059.00	\$2,059.00
7/14/2023	\$852.00	\$852.00
7/20/2023	\$522.00	\$130.50 (time of .3)
7/24/2023	\$913.50	\$522.00 (time of 1.2)
7/25/2023	\$87.00	\$87.00
8/8/2023	\$43.50	\$43.50
8/14/2023	\$1,207.00	\$284.00 (time of .4)
8/15/2023	\$426.00	\$284.00 (time of .4)
8/28/2023	\$1,610.00	\$280.00 (time of .8)
8/29/2023	\$217.50	\$87.00 (time of .2)
8/30/2023	\$2,800.00	\$420.00 (time of 1.2)
9/21/2023	\$87.00	\$43.50 (time of .1)
10/4/2023	\$609.00	\$87.00 (time of .2)
10/5/2023	\$565.50	\$130.50 (time of .3)
10/6/2023	\$130.50	\$87.00 (time of .2)
10/9/2023	\$639.00	\$130.50 (time of .3)
10/9/2023	\$2,131.50	\$522.00 (time of 1.2)
10/30/2023	\$1,174.50	\$348.00 (time of .8)
10/31/2023	\$1,000.50	\$174.00 (time of .4)
11/9/2023	\$315.00	\$315.00
11/13/2023	\$217.50	\$87.00 (time of .2)
11/13/2023	\$630.00	\$175.00 (time of .5)
11/30/2023	\$670.00	\$234.50.00 (time of .7)
12/4/2023	\$268.00	\$201.00 (time of .6)
12/6/2023	\$1,775.50	\$703.50 (time of 2.1)
12/7/2023	\$904.50	\$167.50 (time of .5)
12/17/2023	\$1,261.50	\$130.50 (time of .3)
12/19/2023	\$1,348.50	\$174.00 (time of .4)
12/27/2023	\$315.00	\$87.00 (time of .2)
1/3/2024	\$1,128.00	\$188.00 (time of .4)
1/3/2024	\$1,377.00	\$243.00 (time of .3)
2/5/2024	\$750.00	\$300.00 (time of .8)
3/25/2024	\$900.00	\$300.00 (time of .8)
5/1/2024	\$141.00	\$47.00 (time of .1)
5/30/2024	\$937.50	\$375.00 (time of 1.0)
5/30/2024	\$517.00	\$470.00 (time of 1.0)
6/3/2024	\$740.00	\$740.00
6/5/2024	\$420.00	\$200.00 (time of 1.0)
6/6/2024	\$340.00	\$200.00 (time of 1.0)
6/7/2024	\$220.00	\$160.00 (time of .8)
6/10/2024	\$56.00	\$56.00
6/19/2024	\$1,377.00	\$648.00 (time of .8)

7/2/2024	\$799.00	\$423.00 (time of .8)
7/10/2024	\$324.00	\$324.00
7/16/2024	\$3,402.00	\$972.00 (time of 1.2)
7/16/2024	\$94.00	\$47.00 (time of .1)
7/17/2024	\$1,081.00	\$94.00 (time of .2)
8/17/2024	\$2,592.00	\$486.00 (time of .6)
8/18/2024	\$972.00	\$324.00 (time of .4)
9/3/2024	\$1,927.00	\$705.00 (time of 1.5)
9/3/2024	\$2,187.00	\$658.00 (time of 1.4)
9/5/2024	\$347.50	\$347.50
<b>Total</b>	<b>\$58,840.50</b>	<b>\$19,825.87</b>

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on March 17, 2025, in Hennepin County, Minnesota

Dated: March 17, 2025

s/Cianna G. Halloran  
Cianna G. Halloran

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